UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

October 21, 2009

REPLY TO THE ATTENTION OF:

Mr. Jerry C. Winslow
Principal Environmental Engineer
Xcel Energy
414 Nicollet Mall (Ren. Sq. 8)
Minneapolis, Minnesota 55401

SR-6J

RE: Performance Standards for Wet Dredging Scenario
Ashland/NSP Lakefront Superfund Site

Dear Mr. Winslow:

The U.S. Environmental Protection Agency (EPA) Region 5, in consultation with Wisconsin Department of Natural Resources (WDNR), has reviewed the recent correspondence (letters dated September 11 and 23, 2009, and the September 17th technical meeting power point presentation) from Northern States Power Company (NSPW), (d.b.a. Xcel Energy) regarding the performance standards for a wet dredge scenario.

EPA has attached a Technical Memorandum that describes a performance standards decision tree for the sediment portion of the Ashland/NSP Lakefront site. We recognize that this is only a subset of the overall performance standards, however, these are the critical performance standards that need to be implemented to assure a successful wet dredge project. Also attached is a revised Figure 1 – Summary of Toxicity Data for Sandy Sediments, to show the mortality rate relative to the 22 ppm tPAH single sample maximum. As Figure 1 clearly depicts, Xcel's proposed single sample maximum of 110 ppm tPAH, would have acute toxic effects on the benthic community. For this reason the attached Technical Memorandum and performance standards decision tree retains the requirement that no single sample will exceed 22 ppm tPAH, however, as explained in the Technical Memorandum, the post dredge sample core will include the top 6 inch layer of the generated residual layer. The 22 ppm tPAH standard, therefore, ensures the protection of the benthic community while the 6 inch core sample provides a composite of the generated residual layer to meet the performance standard.

If you have any questions, please contact me at (312) 886-1999.

Sincerely,

Scott Hansen

Scott K. Hansen
Remedial Project Manager

cc: Jamie Dunn, WDNR
Omprakash Patel, Weston Solutions, Inc.